

# EXHIBIT 20

CONFIDENTIAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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)  
ANIBAL RODRIGUEZ, et al., )  
individually and on behalf of )  
all others similarly situated, )  
)  
Plaintiffs, )  
) Case No.:  
vs. ) 3:20-CV-04688  
)  
GOOGLE LLC, et al., )  
)  
Defendant. )  
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Videotaped Deposition of  
ANIBAL RODRIGUEZ  
(Conducted Remotely)  
Sunday, October 16, 2022  
12:03 p.m. EDT

Job No.: 5516994  
Reported by: BRENDA MATZOV, CSR NO. 9243

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1 use your words -- was engaging in disturbing 14:00:52  
2 conduct by collecting data while WAA is off 14:00:56  
3 factor into your decision to purchase another 14:00:56  
4 phone that used the Android software system? 14:01:00

5 A. Because, you know, being limited to 14:01:05  
6 what I have as far as options. Again, I'm not 14:01:06  
7 a rich person. I don't -- I don't have money 14:01:09  
8 to buy certain phones. My provider had a great 14:01:11  
9 deal and I had to do that. Sometimes I -- you 14:01:16  
10 know, you have to go that route. I mean, that's 14:01:19  
11 basically what it comes down to. I mean, that's -- 14:01:23  
12 that's why I chose to do that. 14:01:25

13 But, again, WAA's off, it should not 14:01:29  
14 be collecting data, you know. It -- it's plain 14:01:33  
15 and simple. 14:01:37

16 And, again, we're -- we're -- we're 14:01:42  
17 in this here. And as -- as far as what we're 14:01:43  
18 investigating, I didn't want to change any of 14:01:51  
19 my -- my -- my activities or -- or what I'm doing 14:01:53  
20 if before -- if -- if we're in this investigation, 14:01:59  
21 I needed to keep what I had. 14:02:01

22 So my phone still had same apps, still 14:02:04  
23 have WAA off, and my -- my behaviors are still 14:02:08  
24 the same. In order for this to continue, I want 14:02:11  
25 to make sure that you know that I still have 14:02:15

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1 the same behaviors. 14:02:17

2 Q. Why did you think it was important 14:02:21

3 that you have the same behaviors during your 14:02:24

4 investigation? 14:02:26

5 A. Because we're -- we're in this 14:02:27

6 investigation. And if -- if everything is -- 14:02:28

7 you know, if -- if you are indeed taking 14:02:30

8 information from me without my permission, 14:02:34

9 we need to know. So my phone is still there, 14:02:36

10 the same way it was before -- before the 14:02:40

11 allegation and while we're in this deposition. 14:02:42

12 So why I have the same phone is so 14:02:45

13 that way we can figure out what's going on. 14:02:49

14 And, obviously, at the end of the day, we'll 14:02:52

15 figure out what -- what's really happening. 14:02:54

16 Q. How will you do that? 14:02:57

17 A. Well, you're -- we're -- we're doing 14:03:00

18 an investigation. We're in this lawsuit here. 14:03:01

19 And I have lawyers and other professionals that 14:03:04

20 are looking into that. 14:03:08

21 Q. Besides what your lawyers are doing, 14:03:13

22 do you have any knowledge about what is being 14:03:14

23 done to investigate your allegations? 14:03:17

24 MR. LEE: I think she's asking about 14:03:21

25 things beyond discussions you've had with counsel. 14:03:23

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED]  
4 With my other -- with the other e-mails, 19:52:06  
5 again, I want -- I wanted it to link to my -- my 19:52:07  
6 account. When I say "linked," I mean a way for 19:52:12  
7 me to toggle through the different e-mails and 19:52:16  
8 also get notifications that, if an e-mail comes 19:52:20  
9 up with any of my kids' school or any purchases, 19:52:23  
10 they pop up. And that's why I use Gmail. 19:52:28  
11 Again, if -- if -- us -- when my 19:52:33  
12 regular account was switched off, adding another 19:52:37  
13 e-mail, it -- it -- there's this thing where it 19:52:42  
14 automatically goes into WAA on. And I wish that -- 19:52:46  
15 that didn't happen, where I had to go back and 19:52:49  
16 double-check and make sure and make -- you know, 19:52:52  
17 turn it off. That's the case. 19:52:55  
18 There's -- you know, why I didn't do 19:53:00  
19 a Yahoo account? I figure that it's easier to 19:53:02  
20 do a Gmail. And I'm the one that's actually 19:53:07  
21 looking at any information that's being sent 19:53:11  
22 to that e-mail, with -- with the exception to 19:53:16  
23 the "awesomenb." [sic] 19:53:18  
24 Q. Is there a reason you didn't want to 19:53:22  
25 take the harder route of creating a Yahoo account 19:53:24

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1	while you investigated your claims against Google?	19:53:25
2	A. Because I already have my account already	19:53:30
3	here. I already have my account on Google, my --	19:53:34
4	my -- my -- my Google account on my device. And,	19:53:39
5	again, it's easier to just go to Google and press	19:53:43
6	"Add an account," create the e-mail really quick,	19:53:47
7	get your password and such, and then have it in	19:53:51
8	my dashboard to pick. But they don't have access	19:53:55
9	to those e-mails that I created on my phone.	19:54:01
10	MR. LEE: Hey, guys.	19:54:05
11	MS. ARAKAKI: I --	19:54:05
12	MR. LEE: We're going to need to take	19:54:05
13	a break because our -- our food's here and we	19:54:07
14	gotta go downstairs to get it. So I can't leave	19:54:11
15	the guy waiting. Can we take a -- a ten-minute	19:54:11
16	short break while we can do that? And we'll	19:54:14
17	come back up. I think we can just -- we just	19:54:17
18	got munchables. So we're not going to take any	19:54:20
19	time for dinner. But I do need to grab the food	19:54:23
20	before the guy -- delivery guy leaves.	19:54:25
21	MS. ARAKAKI: Okay. I'm not going to	19:54:28
22	agree to go off the record just yet. But I am	19:54:29
23	almost done. And then we can go off the record.	19:54:30
24	MR. LEE: Actually --	19:54:34
25	MS. ARAKAKI: I'm going to ask my next --	19:54:34

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1 BY MS. ARAKAKI: 20:08:30

2 Q. Apart from making sure WAA is off, 20:08:31

3 did you change your behavior in the way you 20:08:33

4 interacted with any of the apps after and as 20:08:36

5 a result of the allegations in your July 2020 20:08:39

6 Complaint? 20:08:42

7 MR. LEE: Asked and answered. 20:08:44

8 THE WITNESS: No. The -- it -- it's -- 20:08:44

9 I continue on with the WAA off and same behaviors. 20:08:46

10 I mean, it's -- what I changed was the -- the -- 20:08:52

11 the WAA, making sure it's off, making sure all 20:08:55

12 my e-mails -- because I didn't know that they 20:08:58

13 were on and then make sure they're off. But 20:09:00

14 once I could -- once I did that, I continued 20:09:03

15 on. 20:09:06

16 BY MS. ARAKAKI: 20:09:10

17 Q. Based on and as a result of the 20:09:10

18 allegations you believe to be true in your 20:09:12

19 initial Complaint that was filed on July 20:09:15

20 2020, did you direct [REDACTED] to change any 20:09:17

21 of his behavior with respect to the apps 20:09:21

22 on his Samsung phone? 20:09:23

23 A. Did I direct him to do -- to -- 20:09:27

24 to change any -- anything on his phone? I 20:09:29

25 believe so. That was definitely something 20:09:36

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1 Q. -- as a result -- 20:10:50

2 A. We're -- we're talking about apps 20:10:52

3 here and all my behaviors regarding those apps 20:10:55

4 and my son's behaviors regarding those apps. 20:11:02

5 Specific ones, I -- I -- I don't -- 20:11:06

6 I -- I don't know what -- how am I going to 20:11:08

7 know which specific ones to look out for? 20:11:11

8 Q. So I'm not asking about any specific 20:11:18

9 app or any specific thing you should look out 20:11:20

10 for. 20:11:24

11 [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

25 Q. Have you installed new apps since 20:12:21

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1	July 2020?	20:12:21
2	A. Yes.	20:12:22
3	Q. Before installing new apps after	20:12:23
4	July 2020, did you investigate whether those	20:12:26
5	apps use Google Analytics for Firebase?	20:12:29
6	A. No.	20:12:35
7	MS. ARAKAKI: Mr. Lee, did you want	20:12:50
8	to go off the record to eat the dinner that	20:12:51
9	you all had picked up?	20:12:54
10	MR. LEE: Well, I'm not eating at	20:13:00
11	this point. So --	20:13:01
12	THE WITNESS: I'm good.	20:13:03
13	MR. LEE: What's the time on the	20:13:04
14	record? Are you done? Lori, are you done?	20:13:05
15	MS. ARAKAKI: No. I have -- no. I	20:13:12
16	have a little more. But it was a good breaking	20:13:12
17	point. So --	20:13:16
18	MR. LEE: A good breaking point for	20:13:17
19	you now?	20:13:20
20	MS. ARAKAKI: -- I wanted to ask.	20:13:20
21	Yes. It was a good breaking point.	20:13:21
22	So I wanted --	20:13:23
23	MR. LEE: For who?	20:13:23
24	MS. ARAKAKI: -- to ask if you wanted	20:13:23
25	a break.	20:13:23

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1 when WAA is off, that that information will not 20:40:03  
2 be gathered by the app. 20:40:12

3 Q. Are you able to answer this following 20:40:25  
4 question with a "yes" or "no"? 20:40:27

5 Have you ever withdrawn your consent 20:40:29  
6 with any third-party app to collect your data 20:40:32  
7 and send it to Google? 20:40:35

8 A. It -- it -- I -- I don't think -- I 20:40:39  
9 mean, that's -- I have not, because it's not -- 20:40:41  
10 it doesn't matter. It -- it's -- it -- my deal 20:40:45  
11 is not with -- my deal is with them when I -- 20:40:49  
12 when I -- if I decide to do that. 20:40:52

13 If I decide to tell them, hey, look, 20:40:54  
14 don't send information to Google or it's okay 20:40:58  
15 for me -- for you to send to Google. At the 20:41:02  
16 end of the day, whether or not I -- I -- I 20:41:06  
17 consent or do not consent or contact them to 20:41:08  
18 tell them that I do not consent and want to -- 20:41:13  
19 want to use their app, that's up to me to do 20:41:16  
20 with them specifically. 20:41:19

21 You're just recommending that I do 20:41:19  
22 that on this here, so that way it's easier for 20:41:21  
23 you guys not to receive it. But if -- like I 20:41:25  
24 said, if we're -- if you say that you're not 20:41:31  
25 going to take that information when Google -- 20:41:34

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CERTIFICATE OF REPORTER

I, BRENDA MATZOV, CSR NO. 9243, do hereby  
certify:

That, prior to being examined, the witness  
named in the foregoing deposition was remotely duly  
sworn by me to testify the truth, the whole truth,  
and nothing but the truth;

That the foregoing deposition was taken  
remotely before me, at which time the aforesaid  
proceedings were stenographically recorded by me  
and thereafter transcribed by me;

That the foregoing transcript, as typed,  
is a true record of the said proceedings;

And I further certify that I am not  
interested in the action.

Dated this 28th day of October, 2022.

A handwritten signature in blue ink that reads "Brenda Matzov". The signature is written in a cursive style and is underlined with a single horizontal line.

BRENDA MATZOV, CSR NO. 9243